



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 14, 2020

BY ECF

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Michael McConnell, 19 Cr. 647 (LAK)

Dear Judge Kaplan:

The Government writes, with the consent of the defense, to request that the conference scheduled for May 27, 2020 at 11:00 a.m. be adjourned for approximately 30 days. The defendant is prepared to enter a plea of guilty pursuant to a plea agreement. Current conditions, however, do not permit a change of plea hearing to be held in person. Because the defense does not believe there presently exist "specific reasons that the plea in [this] case cannot be further delayed without serious harm to the interests of justice," as required by Section 15002(b)(2)(A) of the CARES Act for a remote plea proceeding, the parties request the conference be adjourned for approximately 30 days. Should the Court determine that such reasons exist, however, the parties are prepared to move forward by videoconference or teleconference.

If the Court grants the adjournment, the Government further requests, with the consent of the defense, that Speedy Trial time be excluded until the next conference date, to permit the defendant to enter a change of plea in person.

A proposed order is submitted herewith.
Conference adjourned to 6/27/2020 at 11 am. Time excluded through that date on the grounds that the interests of justice served thereby outweigh the interests of the defendant and the public in a speedy trial for the reasons set forth above.

SO ORDERED.

Dated: May 15, 2020

Lewis A. Kaplan
5/15/2020

cc: David Colgan, Esq. (by ECF)

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/ Alexander Li
Alexander Li
Assistant United States Attorney
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